

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**PLAINTIFFS' MOTION TO COMPEL RESPONSES TO INTERROGATORIES BY  
DEFENDANT U.S. ALL STAR FEDERATION**

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Plaintiffs Jessica Jones and Christina Lorenzen (collectively, "Plaintiffs"), individually and on behalf of all others similarly situated, move this Court, pursuant to Fed. R. Civ. P. 37 and Local Rule 26.1(b), for an order compelling Defendant U.S. All Star Federation, Inc. ("USASF") to respond fully to Plaintiff's First Set of Interrogatories. USASF has objected and refused to comply with the following discovery requests, the responses to which are set forth verbatim, in accordance with Local Rule 26.1(b)(2):

**Interrogatory No. 1:**

State each affirmative defense to the claims against You.

**Objection and Response to Interrogatory No. 1:**

USASF objects to this Interrogatory as premature as it seeks information that USASF is not required to provide prior to filing an answer in this case. USASF further objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and work product doctrine. Subject to and without

waiving any of the foregoing objections, USASF will identify any affirmative defenses when an answer is required under the Federal Rules of Civil Procedure.

**Interrogatory No. 2:**

State each fact which supports each affirmative defense stated in response to Interrogatory No. 1.

**Objection and Response to Interrogatory No. 2:**

USASF objects to this Interrogatory as premature as it seeks information that USASF is not required to provide prior to filing an answer in this case. USASF further objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and work product doctrine. Moreover, USASF objects to this Interrogatory on the basis that it contains multiple subparts, one for each affirmative defense that USASF will ultimately assert. Based on the Second Set of Interrogatories already served by Plaintiffs, Plaintiffs are far in excess of the twenty-five interrogatory limit set forth in Rule 33 of the Federal Rules of Civil Procedure. Subject to and without waiving the foregoing objections, USASF will identify the facts supporting its affirmative defenses when and to the extent it is required to do so under the Federal Rules of Civil Procedure.

Dated: April 14, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

Joseph R. Saveri\*  
Steven N. Williams\*  
Ronnie Seidel Spiegel\*  
Kevin E. Rayhill\*  
Elissa A. Buchanan\*  
Anna-Patrice Harris\*  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1000  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
swilliams@saverilawfirm.com  
rspeigel@saverilawfirm.com  
krayhill@saverilawfirm.com  
eabuchanan@saverilawfirm.com  
aharris@saverilawfirm.com

Van Turner (TN Bar No. 22603)  
**BRUCE TURNER, PLLC**  
2650 Thousand Oaks Blvd., Suite 2325  
Memphis, Tennessee 38118  
Telephone: (901) 290-6610  
Facsimile: (901) 290-6611  
Email: vturner@bruceturnerlaw.net

Daniel E. Gustafson  
Daniel C. Hedlund  
Daniel J. Nordin  
Ling S. Wang  
**GUSTAFSON GLUEK PLLC**  
Canadian Pacific Plaza  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: (612) 333-8844  
Facsimile: (612) 339-6622  
Email: dgustafson@gustafsongluek.com  
dhedlund@gustafsongluek.com  
dnordin@gustafsongluek.com  
lwang@gustafsongluek.com

Richard M. Paul III\*  
Sean R. Cooper\*  
**PAUL LLP**  
601 Walnut, Suite 300  
Kansas City, Missouri 64106  
Telephone: (816) 984-8100  
Email: rick@paulllp.com  
sean@paulllp.com

Jason S. Hartley\*  
**HARTLEY LLP**  
101 West Broadway, Suite 820  
San Diego, CA 92101  
Telephone: (619) 400-5822  
Email: hartley@hartleyllp.com

\* *Admitted pro hac vice*

*Attorneys for Individual and Representative Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri

Joseph R. Saveri